

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JANE DOE,

Plaintiff,

v.

LEON BLACK,

Defendant.

Case No. 1:23-cv-06418-JGLC

DECLARATION OF SUSAN ESTRICH

I, SUSAN ESTRICH, do hereby declare under penalty of perjury that the following is true and correct:

1. My name is Susan Estrich. I am the founding partner of Estrich Goldin LLP and am admitted *pro hac vice* in this case.

2. I respectfully submit this declaration in support of Defendant's Motion for Sanctions Against Wigdor LLP and Jeanne Christensen (the "Motion"). I am fully familiar with all matters set forth in this Declaration based on personal knowledge about the facts and matters below.

3. A true and correct copy of the letter I served to Jeanne Christensen and Wigdor on August 25, 2023, with a warning letter pursuant to Rule 11(c)(2) of the Federal Rules of Civil Procedure (the "Rule 11 Letter") is attached hereto as Exhibit A. A version of this letter was previously filed in this case. See ECF Doc. Nos. 36-1 (sealed) and 57-1 (redacted).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in New York, New York, on October 30, 2023.

By: /s/ Susan Estrich
Susan Estrich
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